

REMARKS

This is intended as a full, complete, and timely response to the Office Action dated May 23, 2003, having a shortened statutory period for response set to expire on August 23, 2003. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-2, 4-5, and 7-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Selwyn* (U.S. Patent No. 5,849,135) in view of *Kim* (U.S. Patent No. 5,927,308) and in further view of *Kimura, et al.* (U.S. Patent No. 5,908,657). Applicants respectfully traverse this rejection on grounds that claims 1-2, 4-5, and 7-10 recite one or more limitations that are not taught, shown, or suggested by the cited references.

Selwyn discloses a chamber configured to remove particles from wafers via the use of plasmas and mechanical agitation. In *Selwyn*, electrode 12 is configured to support a wafer 14 so that the plasma generated between electrodes may interact with the wafer. However, *Selwyn* does not disclose a hemispherical reinforcement member for the electrode 12 supporting the wafer.

Kim discloses a substrate 10 placed atop an annular transducer 20. *Kim* also does not disclose a hemispherical reinforcement member for the annular transducer 20 supporting the substrate. The annular transducer 20 serves in the capacity of a substrate receiving member and therefore cannot be a reinforcement member attached or affixed to the under portion of the substrate receiving member.

Kimura, et al. discloses a wafer held stationary atop a conical spin chuck 102 by means of vacuum suction. Contrary to the Examiner's statement, *Kimura, et al.* does not disclose a hemispherical shaped reinforcement member. The conical spin chuck 102 serves in the capacity of a substrate receiving member and therefore cannot be a reinforcement member attached or affixed to the under portion of a substrate receiving member. Consequently, none of the references combined by the Examiner disclose the hemispherical reinforcement member of claim 1.

The hemispherical reinforcement member 602 of the present invention supports the substrate support member 604, which supports the substrate 605 on its upper surface 606. The Examiner erroneously identified the transducer 20 of *Kim* and the spin

chuck 102 of *Kimura, et al.* as reinforcement members. Neither component serves in the capacity of a reinforcement member. Furthermore, the spin chuck 102 of *Kimura, et al.* as, is not hemispherical.

It is not obvious from the combined references to modify the invention of *Selwyn* to include a reinforcement member because the combination of the above references would only suggest that the shape of the substrate receiving member could be modified. Therefore *Selwyn, Kim, and Kimura, et al.*, alone or in combination, do not teach, show, or suggest an annular substrate receiving member having an upper substrate receiving surface formed thereon, a hemispherical reinforcement member affixed to a lower surface of the substrate receiving member, and an elongated stem portion affixed at a distal end to the hemispherical reinforcement member, as recited in claim 1. Withdrawal of the rejection of claim 1 is respectfully requested.

Claims 2, 4-5, and 7-10 are dependent upon claim 1 and are patentable because claim 1 is patentable. Applicants respectfully request withdrawal of the rejection.

Claims 11-12, 14-15 and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Selwyn* (U.S. Patent No. 5,849,135) in view of *Kim* (U.S. Patent No. 5,927,308) and in further view of *Kimura, et al.* (U.S. Patent No. 5,908,657). Applicants traverse this rejection and respectfully submit that claims 11-12, 14-15 and 19 recite limitations that are neither taught, shown, nor suggested by the cited references.

As stated above for claim 1, the Examiner erroneously identified the transducer 20 of *Kim* and the spin chuck 102 of *Kimura, et al.* as reinforcement members. Neither component serves in the capacity of a reinforcement member. It is not obvious to modify the invention of *Selwyn* to include a reinforcement member because combination of the above references does not include a reinforcement member for a substrate receiving member. Therefore, *Selwyn, Kim, and Kimura, et al.*, alone or in combination, do not teach, show, or suggest a substrate receiving member, a reinforcement member attached to an underside of the substrate receiving member, an elongated stem member attached to the reinforcement member, and an actuator device in communication with the elongated stem member, as recited in claim 11. Applicants respectfully request withdrawal of the rejection of claim 11.

Claims 12, 14-15 and 19 are dependent upon claim 11 and are patentable because claim 11 is patentable. Applicants respectfully request withdrawal of the rejection.

Claims 3 and 16-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Selwyn* (U.S. Patent No. 5,849,135) in view of *Kim* (U.S. Patent No. 5,927,308) and in further view of *Kimura, et al.* (U.S. Patent No. 5,908,657) as applied to claims 2 and 11 and further in view of *Jysky, et al.* (U.S. Patent No. 3,945,613). Claims 3 and 16-18 are dependent upon claim 1 and 11 and are therefore patentable because claim 1 and 11 are patentable. Applicants respectfully request withdrawal of the rejection.

Claims 6 and 13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Selwyn* (U.S. Patent No. 5,849,135) in view of *Kim* (U.S. Patent No. 5,927,308) and in further view of *Kimura, et al.* (U.S. Patent No. 5,908,657) as applied to claims 4 and 12 and further in view of *Dyer, et al.* (U.S. Patent No. 5,800,623). Claims 6 and 13 are dependent upon claim 1 and 11 and are therefore patentable because claim 1 and 11 are patentable. Applicants respectfully request withdrawal of the rejection.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the method or apparatus of the present invention. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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